

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER

AMENDED NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

**TO: Eric Abraham, Esq.
Hill Wallack LLP
21 Roszel Road
Princeton, New Jersey 08540**

*Attorneys for Defendants Hetero Labs Limited and Hetero Drugs, Limited (hereinafter
“Defendants”).*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Bandaru (“B.V. Rama Rao”) Vekata Ramarao, Associate Vice-President of Head-Quality Assurance, on February 4 and 5, 2021, at 8:30 a.m. eastern standard time, and continuing until completion, at Hill Wallack LLP, 21 Roszel Road, Princeton, New Jersey 08540, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached hereto, followed by deposition of the witness in the witness’s individual capacity. The witness

shall produce the documents requested at Exhibit B, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

Topics 23 & 25

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

February 2, 2021

PLAINTIFFS' CO-LEAD COUNSEL

By: /s/Adam M. Slater
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EXHIBIT A

30(B)(6) TOPICS

Testing

9. The testing performed by any entity or person other than HLL or its agents but known to HLL, to evaluate the purity and contents of HLL's finished dose.
12. The chromatogram and mass spectrometry or other results for all testing by HLL or its agents of HLL's finished dose.

Quality Assurance and Quality Control Activities

23. HLL's application of cGMPs intended to prevent, detect, or act in response to any carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, in connection with the manufacture and contents of HLL's valsartan finished dose.
25. HLL's SOPs/policies/procedures for determining when it is appropriate to conduct a genotoxic analysis of the process associated with finished dose manufacturing.

EXHIBIT B

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Bandaru (“B.V. Rama Rao”) Vekata Ramara.
2. The complete production of Bandaru (“B.V. Rama Rao”) Vekata Ramara’s relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

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